

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS**

UNITED STATES OF AMERICA)
)
)
VS.) CR No. 04-CR-10336 NMG
)
JULIO SANTIAGO) SEPTEMBER 12, 2006

MEMORANDUM IN SUPPORT OF MOTION FOR DEPOSITION

The defendant intends to depose the witnesses Cepero, Hanson and Chavez on the subject of coded language and the relationship of drug weight to distribution.

Rule 15 permits depositions to be taken due to exceptional circumstances where it is in the interests of justice. See United States v. McKeeve, 131 F.2d 1 (1st Cir. 1997); United States v. Mann, 590 F.2d 365 (1st Cir. 1978).

/s/ *JOHN F. CICILLINE*

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CERTIFICATION

I hereby certify that on September 12, 2006 a true copy of the above document was served upon all attorneys of record by ECF filing.

/s/ *JOHN F. CICILLINE*